

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

EMMANUEL C. GONZALEZ,	§	
	§	
Plaintiff,	§	
	§	Case No. 2:14-cv-0906
vs.	§	Consolidated Lead Case
INFOSTREAM GROUP, INC.,	§	JURY DEMAND
	§	
Defendant.	§	
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NEW LIFE VENTURES, INC.	§	Case No. 2:14-cv-0907
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GLOBAL PERSONALS, LLC	§	Case No. 2:14-cv-0952
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ELITE MARKETING SOLUTIONS, INC.	§	Case No. 2:14-cv-0963
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SNAP INTERACTIVE, INC.	§	Case No. 2:14-cv-0992
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TAGGED, INC.	§	Case No. 2:14-cv-0993

UNOPPOSED MOTION TO EXTEND DEADLINE

Plaintiff Emmanuel C. Gonzalez (“Plaintiff”) respectfully submits this Unopposed Motion to Extend the Deadline for Filing a Response to Defendant Tagged, Inc.’s Motion to Transfer Venue [Docket No. 32].

On February 17, 2015, Defendant Tagged filed the referenced Motion, seeking to transfer this case to the District Court for the Northern District of California. Given the subject matter and content of Defendant’s Motion, Plaintiff desires to conduct certain limited discovery relating to the issue of venue. Defendant has agreed to respond to such discovery within 14 days of service (which occurred on February 25, 2015). Therefore, in order to allow the parties time to complete the desired discovery, and in order to provide Plaintiff with sufficient time to formulate

a responsive brief, Plaintiff requests a 14-day extension to March 23, 2015, together with leave to conduct venue-related discovery.

The Parties have met and conferred, and Defendant does not oppose the relief requested herein. A proposed Order is being submitted herewith.

March 4, 2015

Respectfully submitted,

/s/ M. Scott Fuller

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**ATTORNEYS FOR PLAINTIFF
EMMANUEL C. GONZALEZ**

CERTIFICATE OF CONFERENCE

The undersigned certifies that on the 4th day of March, 2015, the subject matter of the foregoing Motion was discussed with counsel for Elite Marketing. Opposing counsel does not oppose the relief requested herein.

/s/ M. Scott Fuller

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2015, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ M. Scott Fuller _____